

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HARRY L. SAMUEL,)	
)	C.A. No. 05-037- SLR
Plaintiff,)	
)	JURY OF 12 DEMANDED
v.)	
)	
WARDEN THOMAS CARROLL, et al.,)	
)	
Defendants.)	

DEFENDANT FIRST CORRECTIONAL MEDICAL'S RESPONSES TO
PLAINTIFF'S ADDITIONAL DISCOVERY REQUEST NUMBER 2

24. Plaintiff Samuel requests the name, title and duty of the owner(s) of medical provider First Correctional Medical, in regard to the dental matter in dispute (from 9/3/2004 to 6/30/2005).

RESPONSE: Tammy Kastre, M.D. is and was the CEO and President of First Correctional Medical during the above-mentioned time period.

HECKLER & FRABIZZIO, P.A.

/s/ Gerald J. Hager
Daniel L. McKenty, *DE Bar No. 2689*
Gerald J. Hager, *DE Bar No. 4097*
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First Correctional Medical

Dated: October 12, 2007

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CERTIFICATE OF SERVICE

I, **GERALD J. HAGER**, certify that on this 12th day of October, 2007, copies of *Defendant First Correctional Medical's Responses to Plaintiff's Additional Discovery Request Number 2* were served upon the following individuals:

Via Electronic Service
Ophelia Waters, Esquire
Department of Justice
820 N. French Street
6th Floor
Wilmington, DE 19801

Via First Class Mail
Harry L. Samuel
SBI# 201360
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

/s/ Gerald J. Hager
Gerald J. Hager, DE Bar No. 4097